

EXHIBIT 3

GIANT EAGLE / HBC

ONLY Hydro from HBC - stopped distributing October 2014

GERXDC began distributing CII – CV February 2016

Additional Distributors – McKesson and Anda

14 Pharmacies – 7 in Lake County and 7 in Trumbull County

HBC Facility Washington, PA / GERX Facility Freedom, PA

30 (B) Tsipkakis

NO THRESHOLDS NOV 2009 – Oct 2013

No Written SOMS until August 2014

NO SUSPICIOUS ORDERS Reported

DUE Diligence: Minimal evidence of D.D., 30B stated no documentation of D.D. from 2009 to 2014.

SOM November 2009 – August 1, 2014

1. No written policy
2. No thresholds until Mid-October 2013
3. HBC/GE claims SOM was:
 - a. Warehouse pickers
 - b. Warehouse Superintendent
 - c. DC procurement team
4. Mid October 2013 THRESHOLDS
 - a. 3 x 12 month Company-wide Average by base code
 - b. FLAWS
 - i. Tracked shipped orders – post
 - ii. “Company-wide” average
 - iii. Did not block orders
 - iv. Systematically ignored

SOM 2016 Revised – GERXDC Opened February 2016

February/March 2017 Revised policies

February 2, 2017 – Order Monitoring System Policy and

March 26, 2017 - GE Suspicious Order Monitoring

Algorithms Added to identify suspicious orders to be investigated before shipping

OMS Algorithm generated threshold limits and blocked orders based on:

- Pharmacy location; Chemical Type
- General product indicator
- NDC code; Ordering pattern

OMS added 4 levels of review prior to release or report

1. Mapping providers
2. Payment Types
3. Historic physical Inventory
4. Investigator level reviews (Interviews or store covert investigations)